



**American Pharmacists Association**<sup>®</sup>  
Improving medication use. Advancing patient care.

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[Submitted electronically to EnhancedMTM@cms.hhs.gov]

Gregory Woods  
Director, Division of Health Plan Innovation  
Centers for Medicare & Medicaid Services  
Center for Medicare and Medicaid Innovation  
7500 Security Blvd.  
Baltimore, MD 21244-1850

**Re: Request for Public Comment on the Proposed Enhanced MTM Model Encounter Data Structure and Pilot Monitoring Measures**

Dear Mr. Woods:

The American Pharmacists Association (APhA) is pleased to submit our comments on the Centers for Medicare & Medicaid Services (CMS) Center for Medicare & Medicaid Innovation (CMMI) Request for Public Comment on the Proposed Enhanced MTM Model Encounter Data Structure and Pilot Monitoring Measures. Founded in 1852 as the American Pharmaceutical Association, APhA represents more than 62,000 pharmacists, pharmaceutical scientists, student pharmacists, pharmacy technicians, and others interested in improving medication use and advancing patient care. APhA members provide care in all practice settings, including community pharmacies, hospitals, long-term care facilities, community health centers, physicians' offices, ambulatory clinics, managed care organizations, hospice settings, and the uniformed services.

APhA strongly supports CMMI's Part D Enhanced Medication Therapy Management (MTM) Model Test and its focus on fostering innovation in the MTM program. APhA commends CMMI for developing a comprehensive proposed data encounter structure and core monitoring measures to assess the impact of MTM services on Medicare beneficiaries. Requiring a common data infrastructure will allow plan to plan comparisons on the effectiveness of approaches to MTM delivery and measurement of outcomes of care for Medicare beneficiaries.

**I. Proposed Data Encounter Elements**

APhA supports the 17 proposed data elements in the draft Enhanced MTM Model Encounter Data Specification Plan (hereinafter "Plan"), including the three data elements that will capture the enhanced MTM service provided to the beneficiary. We also support the focus on documentation of referral, procedure, medication therapy issue, and outcome for reporting MTM encounters.

APhA agrees that SNOMED-CT codes represent the best standardized nomenclature set for documenting MTM activities and has supported the extensive work of the Pharmacy Health Information Technology Collaborative to develop SNOMED-CT codes for MTM services. To effectively implement SNOMED-CT codes for documentation and evaluation of MTM services, there needs to be further defining of some codes and consistency in the application of the codes. In addition to prescription drug plans (PDPs) incorporating codes internally, there will need to be further build-out of SNOMED-CT codes within the software systems of health care practitioners working with the plans in order for data to be captured in a meaningful way. APhA encourages CMMI to continue to work with the provider community to facilitate this process, and will be glad assist CMMI on this effort.

## **II. Pilot Monitoring Measures**

APhA supports the three monitoring measures proposed in the Plan as a good starting point for outcomes measurement in the Enhanced MTM Model as care transitions, identification of medication therapy problems, and resolution of medication therapy problems are key areas of focus for MTM services. APhA has been a long supporter of the work of the Pharmacy Quality Alliance (PQA) to develop measures like the proposed care transitions measure. We commend CMMI for spearheading measures like the proposed problem resolution measure that foster coordination of care among providers. As the Enhanced MTM Model evolves, we strongly encourage CMMI to implement additional measures that are focused on the process and outcomes of MTM service delivery in addition to the three proposed monitoring measures.

Thank you for the opportunity to provide feedback on the Plan and for your consideration of our comments. APhA has longstanding experience in MTM delivery in many settings, and we encourage CMMI to use APhA as a resource. We are happy to facilitate discussions between CMMI and our members who currently provide MTM services if that would be helpful. If you have any questions or require additional information, please contact Anne Burns, Vice President, Professional Affairs, at [aburns@aphanet.org](mailto:aburns@aphanet.org) or by phone at (202) 429-7522.

Sincerely,



Thomas E. Menighan, BSPHarm, MBA, ScD (Hon), FAPhA  
Executive Vice President and CEO

cc: Stacie S. Maass, RPh, JD, Senior Vice President, Pharmacy Practice and Government Affairs